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ELECTRONICALLY FILED
DOC #:
DATE FILED: JUN 10 2008

June 9, 2008

BY HAND

Honorable Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Bitti & Quni
08 Cr. 488 (PAC)

Hon. Judge Crotty:

Application GRANTED. The conference is adjourned to 6/17/08 at 4:15 pm in Courtroom 20C. It is further that pursuant to 18 U.S.C. 3161 (b) (8) (A), the time from 6/13/08 until 6/17/08 is excluded in the interest of justice. I find that this exclusion outweighs the best interest of the defendant and the public is a speedy trial. So Ordered.

SO ORDERED: JUN 10 2008

Paul A. Crotty
HON. PAULA A. CROTTY
UNITED STATES DISTRICT JUDGE

I write to request an adjournment of the status conference on the above matter. I have spoken to my adversary AUSA Rohr and my co-counsel Donald Yanella, and my co-counsel and I request and the government consents to our request that the status conference date be changed from that of June 13th to June 17, 2008.

We make this request as both Ms. Bitti and her co-defendant Quni reside in Michigan and we need additional time to have them presented to the Court on the instant indictment. To that end, both Mr. Yanella and I request that the time between June 9, 2008 and June 17 2008, be excluded under the Speedy Trial Act, pursuant to Title 18, United States Code, section 3161(h)(8)(A). Excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial, because it will allow the government and defense counsel to continue discussions regarding a possible disposition in the matter.

Respectfully submitted,


Sabrina P. Shroff

cc: AUSA Rohr & D. Yanella, Esq.

MEMO ENDORSED

MEMO ENDORSED

**Sabrina
Shroff/NYSG/02/FDO@FDO**
06/09/2008 08:18 PM

To Marlon Ovalles/NYSD/02/USCOURTS@USCOURTS@USCEXT
cc rebecca.rohr@usdoj.gov
bcc
Subject Re: 



The 17th at 4:20 please. have sent a ltr. to the court. speedytrial.exclusion.doc

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